

Preview dialing requires a specialist or agent to press a button or use a command before the system can actually dial a phone number - there is no difference in that than if one were to manually dial a phone number. Plus, preview dialing using a system that has the capacity to be changed to auto dial requires manual intervention therefore should be classified at time call is placed. Dialer systems give contact centers the ability to manage campaigns within all the requirements of the law from scrubbing numbers, appropriate business rules, tracking call history, no hold times, and ability to record calls for both the customer and company protection. Nobody likes annoying dialer calls when in predictive mode and especially to your cell phone due to wait times and/or that pause time. But the simple fact is an ADTS can be configured to call current or potential customers in many favorable modes as if it were being manually dialed. The verbiage for "capacity" needs to be better defined for the industry while still protecting consumers from unwanted calls. Thank you for the consideration.